



June 1, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Washington, DC 20554

Radha Sekar
Chief Executive Officer
Universal Service Administrative Company
700 12th St. NW, Suite 900
Washington, DC 20005

Re: EMPA response to ALA's May 11, 2018 Ex Parte Submission Regarding Observations and Recommendations Related to USAC's E-rate workshops. (Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184.)

Dear Secretary Dortch and Ms. Sekar:

The E-Rate Management Professionals Association (E-MPA) is a self-certifying body of E-rate management professionals and consultants. We have organized to promote excellence and ethics among E-rate management professionals. We sincerely welcome Ms. Sekar as Chief Executive Officer of USAC.

The E-rate Management Professional's Association (E-MPA), agrees with most of the observations and recommendations related in the recent letter the American Library Association submitted regarding the upcoming USAC E-Rate Applicant Training in Washington DC. The fall workshops are indeed a critical part of ensuring a successful E-rate application process. It is important to note that fall workshops are valuable to all large stakeholder groups. Limiting the Washington, DC training to only state associated library and school E-rate coordinators excludes two large populations of E-rate power users, consultants and service providers.

E-MPA does not advocate restricting admittance to the USAC provided Washington, DC Fall E-rate Training to any single group of users. E-MPA supports more advanced content at the Washington, DC training so that all groups who tackle complex issues may benefit.

E-MPA members facilitated application submissions for more than 70% of the E-rate dollars requested in 2018. Our firsthand filing experiences can and should be leveraged by USAC to provide real world insight into complex issues faced by applicants. Because we represent such a large part of the applicant community through training, advising and application submission, a large percentage of the consultant community consistently attends USAC provided applicant and/or service provider training across the nation. E-MPA consultants create their training content as a result of their experiences attending USAC training meetings and working directly with USAC staff. Applicants who hire consultants typically do not attend USAC E-rate training, unless they are exceptionally vested in expanding their own E-rate

knowledge due to complex issues they face. These applicants do not attend state E-rate trainings unless there are certain state specific procurement rules on which they need guidance.

For many reasons, there is inconsistency in how each state library and school E-rate coordinator provides outreach and training to groups outside of their oversight. There are some states that simply do not provide E-rate support at the state level. Some who do provide a state coordinator do not provide training budgets or provide limited support for state coordinators who must wear many hats. Consultants are often there as a second line resource to state E-rate coordinators, and in many cases consultants are the primary resource for applicants. In the latter cases, we are the boots on the ground, supporting applicants who are struggling in a very complicated program that provides significant resources to them. Exclusion of consultants from a USAC training is detrimental to applicants as much as it is detrimental to the consulting community.

We agree with ALA's statement, "While we value the webinars USAC has available, these are not a substitute for face-to-face workshops where attendees can talk among themselves and with USAC staff. Attendees' most pressing questions are often addressed through these sidebar conversations, making them invaluable."

We offer the following suggestions to supplement ALA's viewpoint:

1. We have already pointed out that consultants facilitated 70% of the E-rate dollars requested in 2018. Our chart below demonstrates that this figure is rising. While we agree the first training session in Washington DC should be geared toward "E-rate power users", we suggest that the training not be limited to one group of power user. We understand that space may be limited, and in such a case, multiple power user sessions may be offered.

FY	Consultant			No Consultant			Overall		
	BENs	471s	\$ Requested	BENs	471s	\$ Requested	BENs	471s	\$ Requested
2014	13,258	20,003	\$2,957,189,824	14,196	27,273	\$1,996,000,795	27,454	47,276	\$4,953,190,619
2015	13,950	23,389	\$2,424,194,110	13,029	24,818	\$1,513,952,041	26,979	48,207	\$3,938,146,151
2016	14,383	25,506	\$2,137,586,154	9,747	20,728	\$1,502,135,229	24,130	46,234	\$3,639,721,383
2017	14,340	23,902	\$2,015,217,904	8,728	17,187	\$982,648,880	23,068	41,089	\$2,997,866,784
2018	14,207	23,013	\$2,006,985,249	7,312	13,093	\$854,018,205	21,519	36,106	\$2,861,003,454

FY	Consultant			No Consultant		
	BENs	471s	\$ Requested	BENs	471s	\$ Requested
2014	48%	42%	60%	52%	58%	40%
2015	52%	49%	62%	48%	51%	38%
2016	60%	55%	59%	40%	45%	41%
2017	62%	58%	67%	38%	42%	33%
2018	66%	64%	70%	34%	36%	30%

2. While a “train the trainer” event would be a departure from content in most recent trainings, we suggest this first session only provide an advanced track, separate from a beginners session. Perhaps beginners might benefit from training on a different day. While there may be new staff coming on board at these “train the trainer” organizations, usually each organization would provide their own training to these individuals or can rely on their fellow organizations for training. By only focusing on advanced topics, it would give USAC staff ample time to drill down on topics to thoroughly discuss new or complex case studies or USAC processes.
3. Solicit information from all stakeholder groups about relevant topics for which more training is necessary. Often USAC makes decisions about training based on what USAC sees are the issues. However, feedback from those who are on the front line could target hot issues that addressed, could improve the efficiency and efficacy of the program.
4. Provide more in-depth Question and Answer sessions in which training participants are provided clear direction on how to resolve real life E-rate issues. Too often we receive a rule citation or scripted line, without the much-needed translation of how the rule should be implemented based on the real-life situation described. We understand USAC’s reluctance to answer is in many times caution not to misconstrue FCC rules. Program participants are seeking guidance in a proactive effort to stay in compliance with program rules. Failure by USAC to answer these questions based on real situations may lead to unintentional rule violations by applicants who are not ever given an answer. Program participants often would rather hear an answer that they don’t like than no answer at all, because an answer gives them guidance on how to stay in compliance with program rules. Applicants generally want to be compliant and do not want a denial or a COMAD.
5. For reasons stated in suggestion Number 4, we request the opportunity to send questions to USAC in advance of the training. Advance notice of questions should allow USAC the opportunity to seek guidance from the FCC if needed. There is a precedent for such a practice. When USAC offered a monthly Service Provider conference call, attendees were able to submit questions in advance. These questions were answered during the monthly call, providing much-needed guidance to service providers and other attendees.

We respectfully submit this letter and look forward to a continued dialog with USAC on how E-MPA may assist USAC in their endeavor to improve and enhance management of the E-rate program.

Sincerely,

Caroline Wolf
E-MPA Board
Chair, Advocacy Committee